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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND OFFICIAL COMMITTEE OF TORT
CLAIMANTS EXTENDING TIME TO
RESPOND TO BAR DATE MOTION AND
MOTION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
FOR ENTRY OF AN ORDER
APPROVING PROPOSED MODEL
PROOF OF CLAIM FORM FOR FIRE
CLAIMS AND RELATED PROCEDURES**
Re: Dkt. Nos. 1784, 1824

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Official Committee
4 of Tort Claimants (the “**TCC**”), on the other. The Debtors and the TCC are referred to in this
5 Stipulation and Agreement for Order collectively as the “**Parties**,” and each as a “**Party**.” The
6 Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On May 1, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C.*
9 *§§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1*
10 *for Order (I) Establishing Deadline for Filing Proofs of Claim, (II) Establishing the Form and*
11 *Manner of Notice Thereof, and (III) Approving Procedures for Providing Notice of Bar Date and*
12 *Other Information to All Creditors and Potential Creditors* [Dkt. No. 1784] (the “**Bar Date**
13 **Motion**”), which is set for a hearing before the Court at 9:30 a.m. on June 11, 2019. Any
14 response or opposition to the Bar Date Motion is due by 4:00 p.m. (Pacific Time) on May 28,
15 2019.

16 B. On May 3, 2019, the TCC filed the *Motion of the Official Committee of Tort*
17 *Claimants Pursuant to 11 U.S.C. §§ 105(a) and 501 and Fed. R. Bankr. P. 3001(a) for Entry of*
18 *an Order Approving Proposed Model Proof of Claim Form for Fire Claims and Related*
19 *Procedures* [Dkt. No. 1824] (the “**TCC Claim Form Motion**”), which is set for a hearing before
20 the Court at 9:30 a.m. on June 11, 2019. Any response or opposition to the TCC Claim Form
21 Motion is due by 4:00 p.m. (Pacific Time) on May 28, 2019.

22 C. Counsel for the Debtors and counsel for the TCC have agreed that the time for the
23 TCC to respond to the Bar Date Motion and the time for the Debtors to respond to the TCC
24 Claim Form Motion be extended.

25 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
26 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
27 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
28 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
THAT:

1 1. The time for the TCC to file and serve any response or opposition to the Bar Date
2 Motion is extended through 4:00 p.m. (Pacific Time) on May 31, 2019.

3 2. The time for the Debtors file and serve any response or opposition to the TCC Claim
4 Form Motion is extended through 4:00 p.m. (Pacific Time) on May 31, 2019.

6 Dated: May 28, 2019

Dated: May 28, 2019

7 KELLER & BENVENUTTI LLP

BAKER & HOSTETLER LLP

8
9 /s/ Jane Kim

Jane Kim

/s/ Eric R. Goldman

Eric R. Goldman

10 *Attorneys for Debtors*
11 *and Debtors in Possession*

Attorneys for Official Committee of Tort
Claimants